IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF GEORGIA AUGUSTA DIVISION

) CASE NO. 16-11044) CHAPTER 13)	
))))) JUDGE: SUSAN D. BARRETT)))

MOTION FOR LIFT OF STAY

NOW COMES Movant, CONREX PROPERTY MANAGEMENT, LLC. and files this Motion for Lift of Stay, and respectfully shows as follows:

- 1. This is a Motion under 11 U.S.C. Section 362(d) of the Bankruptcy Code for the relief from the automatic stay.
- Debtor, Desiree Tedra Rivera, filed Chapter 13 Bankruptcy on August 2,
 Debtor is a tenant of property located at 3035 Miranda Road, Augusta, GA 30906. This property is owned by Conrex Property Management, LLC.
- 3. At the time of filing, Debtor was in pre-petition arrears for payment of rent for the months of June, July and August 2016 for a total of \$2,775.00, not including late fees. Debtor's monthly regular rent payment is \$925.00.
 - 4. Debtor paid the September and October 2016 rent.

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- 5. Debtor has failed to pay the November 2016 post-petition rent.
- 6. Because of Debtor's default and clear inability to make all required payments, Movant is not adequately protected.

WHEREFORE, CONREX PROPERTY MANAGEMENT, LLC requests that the Motion for Lift of Stay be granted, plus any and all further relief this Court deems appropriate.

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